

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

v.

PENN WEST PETROLEUM LTD., d/b/a
OBSIDIAN ENERGY LTD., TODD H.
TAKEYASU, JEFFERY A. CURRAN, and
WALDEMAR GRAB,

Defendants.

No. 17 Civ. 4866 (GHW)

**NOTICE OF DEFENDANT JEFFERY A. CURRAN'S AND TODD H. TAKEYASU'S
UNOPPOSED MOTION FOR ISSUANCE OF LETTERS ROGATORY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Helen Gredd, dated March 21, 2018, Defendants Jeffery A. Curran and Todd H. Takeyasu will move this Court, before the Honorable Gregory H. Woods, United States District Judge, on a date and time to be set by the Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12C, for the issuance of letters rogatory to obtain evidence in Canada. This motion is unopposed.

Dated: New York, New York
March 21, 2018

/s/ Richard F. Albert

Richard F. Albert
Jasmine Juteau
MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO P.C.
565 Fifth Avenue
New York, New York 10017
Tel: (212) 856-9600
Fax: (212) 856-9494
ralbert@maglaw.com
Counsel for Defendant Todd H. Takeyasu

/s/ Helen Gredd

Helen Gredd
Leigh G. Llewelyn
Lise Rahdert
LANKLER SIFFERT & WOHL LLP
500 Fifth Avenue
New York, New York 10110
Tel: (212) 921-8399
Fax: (212) 764-3701
hgredd@lswlaw.com
Counsel for Defendant Jeffery A. Curran